

Cyrus Safa
Attorney at Law: 13241
Law Offices of Lawrence D. Rohlfing
12631 East Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670
Tel.: (562) 868-5886
Fax: (562) 868-5491
E-mail: rohlfig.office@rohlfiglaw.com

Gerald M. Welt
Attorney at Law: 1575
411 E. Bonneville Avenue, #505
Las Vegas, NV 89101
Tel.: (702) 382-2030
Fax: (702) 684-5157
E-mail: gmwesq@weltlaw.com; kwp@weltlaw.com

Attorneys for Plaintiff Columbine Devincent Batalona

UNITED STATES DISTRICT Court
DISTRICT OF NEVADA

COLUMBINE DEVINCENT)	Case No.: 2:18-cv-02309-JAD-VCF
BATALONA,)	
)	STIPULATION TO EXTEND TIME
)	OF TIME TO FILE MOTION FOR
Plaintiff,)	REMAND/REVERSAL
)	
vs.)	(SECOND REQUEST)
)	
NANCY A. BERRYHILL, Acting)	
Commissioner of Social Security,)	
)	
Defendant.)	

Plaintiff Columbine Devincent Batalona and Defendant Nancy A. Berryhill,
Acting Commissioner of Social Security, through their undersigned attorneys,
stipulate, subject to this court's approval, to extend the time from April 11, 2019 to
April 25, 2019, for Plaintiff to send her Motion for Remand/Reversal with all other

1 dates in the Court's Scheduling Order extended accordingly. This is Plaintiff's first
2 request for an extension. This request is made at the request of Plaintiff's counsel
3 in order to reset the briefing calendar. The Parties initially stipulated to an
4 extension of time to March 29, 2019 for Defendant to file the certified
5 administrative record. Defendant filed the administrative record early on March
6 12, 2019. Plaintiff calendared its initial briefing from the date of the stipulation.
7 Plaintiff makes this request in order to clarify the briefing calendar and to ensure
8 its motion is timely submitted.

9 DATE: April 11, 2019

Respectfully submitted,

10 LAW OFFICES OF LAWRENCE D. ROHLFING

11 /s/ *Cyrus Safa*

12 BY: _____

13 Cyrus Safa
14 Attorney for plaintiff
Columbine Devincent Batalona

15 DATE: April 11, 2019

16 NICHOLAS A. TRUTANICH
United States Attorney

17 /s/ Michael K. Marriott

18 BY: _____

19 Michael K. Marriott
20 Special Assistant United States Attorney
21 Attorneys for defendant Nancy A. Berryhill
22 Acting Commissioner of Social Security
23 |*authorized by e-mail|

24 DATED: April 12, 2019

25 IT IS SO ORDERED:



26 UNITED STATES MAGISTRATE JUDGE

1
2 **CERTIFICATE OF SERVICE**
3 **FOR CASE NUMBER 2:18-CV-02309-JAD-VCF**

4 I hereby certify that I electronically filed the foregoing with the Clerk of the
5 Court for this court by using the CM/ECF system on April 12, 2019.

6 I certify that all participants in the case are registered CM/ECF users and
7 that service will be accomplished by the CM/ECF system.
8

9 */s/ Cyrus Safa*

10 _____
11 Cyrus Safa
12 Attorneys for Plaintiff
13
14
15
16
17
18
19
20
21
22
23
24
25
26